UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: August 17, 1982

SUBJECT: Closing of Pfister Chemical, Inc. SPCC Compliance Violation File
Your Log No. 36-81

FROM: Henry Gluckstern
Attorney
Water Enforcement Branch

TO: Fred Rubel
Chief
ERHMIB

File

Attached please find a complete copy of the correspondence in our files relating to the Pfister Chemical, Inc. violation referred to this Branch last year. With receipt of the affidavit indicating implementation of the Plan approved by your Branch on July 29, 1982, this case is considered closed on our files.

Please feel free either to retain the files on this matter for whatever future purposes you deem appropriate or to dispose of the files after reducing the information contained therein to some alternative form.

Attachment

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: January 14, 1981 Log No. 36-81

SUBJECT: 40 CFR 112.6 SPCC Plan Violation - Pfister Chemical Co., Ridgefield, N.J.

FROM: Fred N. Rubel, Chief
Emergency Response and Hazardous Materials Inspection Branch

TO: Richard Tisch, Chief
Water Enforcement Branch

Enclosed is an SPCC Plan on-site compliance inspection report of the Pfister Chemical Co. facility located in Ridgefield, N.J. The inspection was conducted on October 3, 1980 by Richard W. Chapin of our Technical Assistance Team.

The report indicates the facility does not have a SPCC plan.

It is requested that legal action be instituted against this facility under the provisions of 40 CFR 112.6. Please process this case on an "as time permits" basis because this is a minor violation caused by the lack of a SPCC plan and the facility has an oil storage capacity of less than 50,000 gallons.

Enclosure

(3)
JAN 29 1981
ABUB

EPA Form 1320-6 (Rev. 3-76)

ecology and environment, inc.
300 McGAW DRIVE, RARITAN CENTER, 2ND FLOOR, EDISON, NEW JERSEY 08817, TEL. 201-225-9659
International Specialists in the Environmental Sciences

November 24, 1980

Mr. Fred N. Rubel, Chief
ER & HMI Branch

Subject: SPCC Inspection of Pfister Chemicals, Inc., Ridgefield, New Jersey
(ref. TDD 2-8009-20) 2019455400 Box 15 07657

Dear Mr. Rubel:

A SPCC inspection of Pfister Chemicals, Inc. was conducted on October 3, 1980. This facility does not have a SPCC plan. The following discusses the inspection and presents the resulting observations made.

Pfister Chemical, Inc. is located along the Hackensack River, off U.S. Route 46 (see attached location figure). The plant has two-15,000 gallon horizontal tanks storing no. 4 fuel oil among their ten horizontal material storage tanks. These oil tanks have a secondary containment wall of concrete block which is approximately four feet high. Their outlet hoses were capped, but the valves were unlocked. The entire facility is fenced, lighted and has 24 hour security.

There is a grated yard drain which runs in front of these tanks. It collects yard drainage as well as process waste water and conveys them to a holding pond where the total flow is neutralized prior to discharge to the Bergen County Sewerage Authority system. Any spillage of oil, or other stored material, would flow into this drain.

While at Pfister, I met with the plant's Technical Director, Arthur F. Gusmano and the Plant Engineer. Both men indicated the facility has no SPCC plan; however, they did indicate the facility has a Coast Guard operations manual. The information contained in this memo was provided by the Plant Technical Director and Engineer during the inspection.

These gentlemen were given a copy of 40 CFR 112 and the procedure for routing the inspection results to the Enforcement Branch was explained. They gave the impression that a SPCC plan would be submitted by Pfister in the near future. (Mr. Gusmano indicated he did not know what a SPCC plan was until this inspection and he had only had his present position for a very short time.

It is recommended that this facility be submitted to the Enforcement Branch for possible action.

Please call if you have questions.

Sincerely yours,

Richard W Chapin

Richard W. Chapin
TAT II

ecology and environment, inc.

300 McGAW DRIVE, RARITAN CENTER, 2ND FLOOR, EDISON, NEW JERSEY 08817, TEL. 201-225-9659

International Specialists in the Environmental Sciences

MEMO

DATE: December 31, 1980

SUBJECT: Applicability of SPCC regulations (40 CFR 112) to Pfister Chemical Company, Ridgefield, N.J. (ref. TDD 2-8009-20)

TO: Fred N. Rubel, Chief, ER&HMI Branch FR 1-12-81

FROM: Richard W. Chapin, TAT II RWC

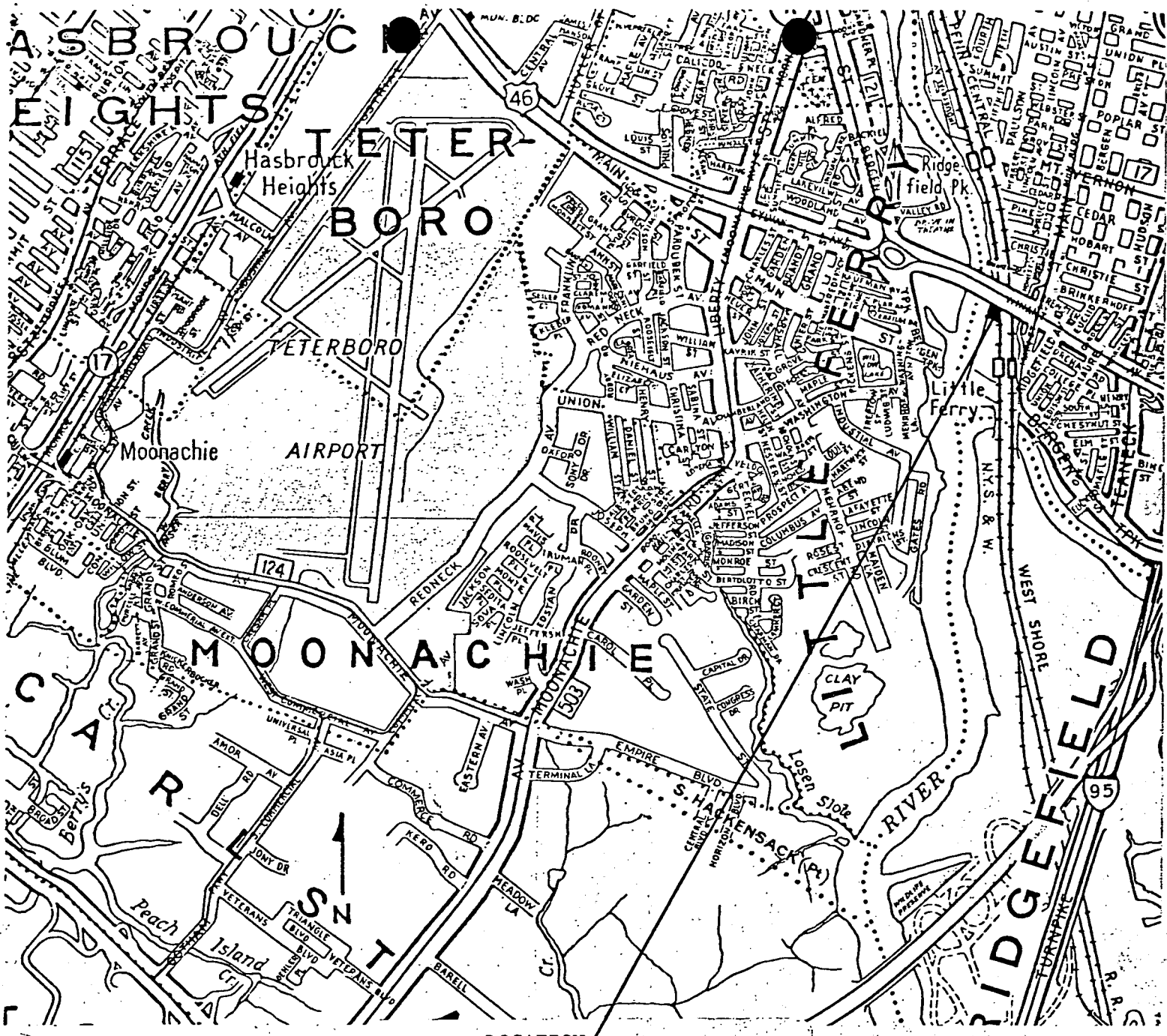
Per your comments of December 16, 1980 on the Pfister Chemical Co. SPCC inspection report, I have reviewed the 40 CFR 112. It is my interpretation that this facility is covered by the regulations.

The important sections are 112.1(b) and 112.1(d)(A). Under 112.1(b), a facility which "..., could reasonably be expected to discharge oil in harmful quantities ..." is required to have an SPCC plan. Section 112.1(d)(A) then states SPCC plans are not required for facilities which could not be reasonably expected to discharge oil. The section goes on to state "This determination shall be based solely upon geographical, locational aspects of the facility (such as proximity to navigable waters...) and shall exclude consideration of manmade features. Given Pfister Chemical is adjacent to the Hackensack River, it could be reasonably expected to discharge oil if the plant drainage system and diking did not exist.

The capability of the Bergen Co. Sewerage Authority treatment plant to remove a large quantity of oil (15-30,000 gallons as worst case) discharged in a slug load is probably poor. In addition, should the interceptor to which Pfister discharges be a combined sewer, oil could be directly by-passed into the river.

Based upon the above discussion, I would conclude Pfister Chemical Co. should have an SPCC plan.

Please call if you have any questions.



LOCATION
Pfister Chemical Company
Ridgefield, N. J.

ORIGINAL MAP FROM HAGSTROM'S
BERGEN Rockland County Atlas

SCALES (Approximate)

0 1000 2000 3000 4000 5000 6000 7000 Feet
0 1 Mile

0 200 400 600 800 1000 2000 Meters
0 1 2 Kilometers

#11

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300 McGAW DRIVE, RARITAN CENTER, 2ND FLOOR, EDISON, NEW JERSEY 08817, TEL. 201-225-9659
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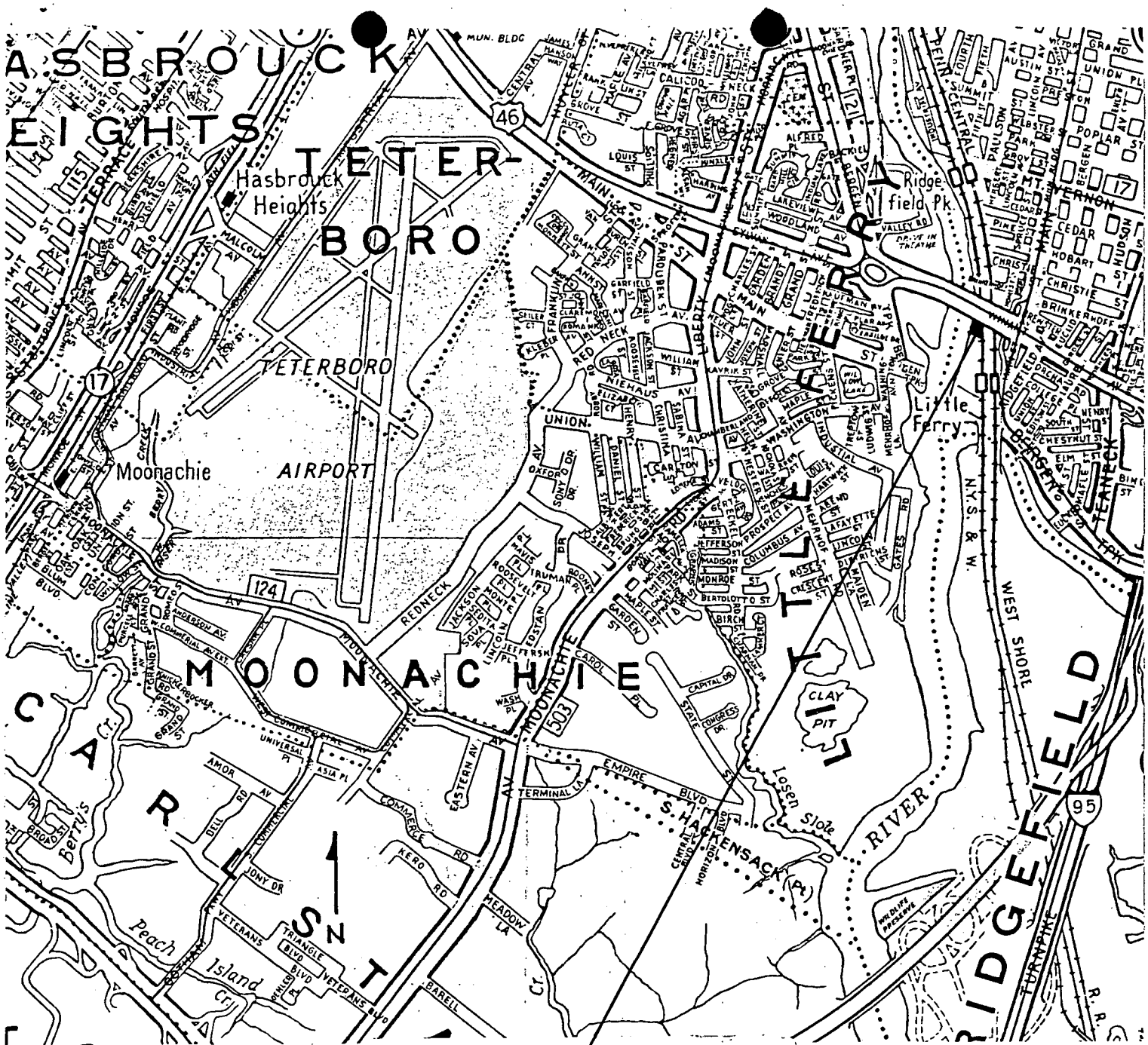
Sincerely yours,

Richard W Chapin

Richard W. Chapin
TAT II



LOCATION
Pfister Chemical Company
Ridgefield, N. J.

ORIGINAL MAP FROM HAGSTROM'S
BERGEN Rockland County Atlas

SCALES (Approximate)

0 1000 2000 3000 4000 5000 6000 7000 Feet

0 1 Mile

0 200 400 600 800 1000 2000 Meters

0 1 2 Kilometers

September 29, 1981

Request for Desk Review of SPCC Plan for Pfister Chemical Company, Ridgefield, New Jersey
Your Log No. 36-81
Henry Gluckstern
Attorney
Water Enforcement Branch
Fred Rubel
Chief
ERHMIB

Attached please find a copy of a new SPCC Plan prepared for the above-referenced corporation. Please place it on your agenda for desk review and preparation of a memorandum either approving it in its present form or indicating the amendments necessary to make it conform to 40 C.F.R. §112.7.

This Plan should be assigned normal priority.

Attachment

2 ENF-WE:GLUCKSTERN:hg:x4430:29 SEP 81

2 ENF-WE

PFISTER

September 25, 1981

Mr. Henry Gluckstern
U.S. E.P.A.
26 Federal Plaza, Rm. 439
New York, New York 10278

Dear Mr. Gluckstern:

As a follow up to our telephone conversation, I have completed an SPCC Plan according to the regulations. As you requested, I am submitting the plan for your approval.

If you need any futher information in this matter, please contact me.

Very truly yours,

Arthur Gusmano

Arthur F. Gusmano
Technical Director

AFG/cs

Encl:

Certified Mail No. 572913

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: JUL 2 9 1982

SUBJECT: 40 CFR 112 Review - Pfister Chemical, Ridgefield, New Jersey 07657 - (Case #36-81)

FROM: Fred N. Rubel, Chief
Emergency Response and Hazardous Materials Inspection Branch

TO: Henry Gluckstern, Attorney
Water Enforcement Branch

An SPCC desk audit of Pfister Chemical, Inc. was conducted on 15 June 1982 by Henry M. Wheat of the Technical Assistance Team (TAT). The results of this review indicate that the plan is complete and well thought out. All aspects of 40 CFR 112 have been clearly addressed, with no apparent violations or deficiencies. This plan is in apparent compliance with 40 CFR 112.

August 2, 1982

Mr. Arthur F. Gusmano
Technical Director
Pfister Chemical, Inc.
Ridgefield, New Jersey 07657

Re: Violation of 40 C.F.R. Part 112

Dear Mr. Gusmano:

Please be advised that EPA Region II staff has completed review of the SPCC Plan submitted under cover of your September 25, 1981 letter to me. EPA regrets the unavoidable delay in responding to Pfister occassioned by diversion of staff resources to certain high-priority hazardous materials sites throughout the Region. Please be adivsed that the Pfister Plan has been found to satisfy the requirements of 40 C.F.R. Part 112.

Kindly complete and return the enclosed affidavit of implementation of the SPCC Plan so that this matter can be closed on EPA's files. Should the Plan not be fully implemented currently, please contact me immediately. Additionally, appropriate personnel within your corporation should be aware of the continuing obligations imposed by 40 C.F.R. Part 112, including triennial review and amendment of the Plan.

Thank you for your prompt attention to this matter.

Sincerely yours,

WARREN LLEWELLYN
Acting Director
Enforcement Division

By: _____
Henry Gluckstern
Attorney
Water Enforcement Branch
Enforcement Division
212-264-4430

Enclosure

2 ENF-WE:GLUCKSTERN:hg:x4430:2 AUG 82

2 ENF-WE

H. Blackstone

AFFIDAVIT OF IMPLEMENTATION OF SPCC PLAN

STATE OF NEW JERSEY)
) ss:
COUNTY OF BERGEN)

ARTHUR F. GUSMANO (name of affiant), being first duly sworn according to law, deposes and states:

(1) To my personal knowledge, the SPCC Plan(s) dated SEPTEMBER 1981 for Respondent's facility/facilities located at RIDGEFIELD, N. J. has/have been fully implemented in accordance with the requirements of that/those Plan(s) as of SEPTEMBER 1981 (date).

Signature: Arthur Gusmano

Printed Name: ARTHUR F. GUSMANO

Sworn to before me this 9th

day of AUGUST 1982.

Claire R. Sahagian
NOTARY PUBLIC

CLAIRE R. SAHAGIAN
NOTARY PUBLIC OF NEW JERSEY
My commission expires April 1, 1987

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II
26 FEDERAL PLAZA
NEW YORK, NEW YORK 10278

August 2, 1982

Mr. Arthur F. Gusmano
Technical Director
Pfister Chemical, Inc.
Ridgefield, New Jersey 07657

Re: Violation of 40 C.F.R. Part 112

Dear Mr. Gusmano:

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Thank you for your prompt attention to this matter.

Sincerely yours,

WARREN LLEWELLYN
Acting Director
Enforcement Division

By: Henry Gluckstern
Henry Gluckstern
Attorney
Water Enforcement Branch
Enforcement Division
212-264-4430

Enclosure

ecology and environment, inc.

300 McGAW DRIVE, RARITAN CENTER, 2ND FLOOR, EDISON, NEW JERSEY 08837, TEL. 201-225-9659

International Specialists in the Environmental Sciences

MEMORANDUM

TO: Michael V. Polito
Emergency Response and Hazardous Materials Inspection Branch, U.S. EPA

FROM: Henry M. Wheat, TAT II Henry M. Wheat

SUBJECT: SPCC Desk Review
Pfister Chemical, Inc.
TDD #2-8110-07A

DATE: June 15, 1982

I have completed the desk review of the September 1981 plan for Pfister Chemical, Inc. The plan is complete and well thought out. All aspects of 40 CFR 112 have been clearly addressed, with no apparent violations of deficiencies. This plan is in apparent compliance with the regulations set forth in 40 CFR 112.

HMW:ls

A. SPCC INSPECTION FIELD SHEET

(To be completed if SPCC Regulation is applicable to Facility - see 40CFR Part 112.1.)

SEE INSTRUCTIONS ON REVERSE

1a. NAME OF FACILITY
Pfister Chemical Inc.

1b. TYPE OF FACILITY
Chemical Process

1c. FACILITY LOCATION
Route #46, Ridgefield, NJ. 07657

2a. NAME OF OWNER AND/OR OPERATOR RESPONSIBLE FOR FACILITY
Albert Bendelius

2b. TELEPHONE NUMBER *Area Code*
(201) 945 - 5400

2c. MAILING ADDRESS
Same

3. TYPES OF OIL STORED AND CAPACITY OF ABOVEGROUND AND BURIED STORAGE.
30,000 gallons #4 oil aboveground

4. IS A CERTIFIED SPCC PLAN AVAILABLE FOR INSPECTION? ☒ YES ☐ NO

5. DATE OF INSPECTION
15 June 82

6. NAME AND REGISTRATION NUMBER OF CERTIFYING ENGINEER ☐ NOT AVAILABLE
Richard P. Brownell, PE # 46611

7. DATE SPCC PLAN WAS CERTIFIED ☐ NOT AVAILABLE
Sept 1981

8. IS SPCC PLAN FULLY IMPLEMENTED? *(Are the items called for in the Plan in the interest of spill prevention actually installed - if observable?)*
☐ NOT APPLICABLE
N/A
desk review

9. NAME OF WATER BODY THAT POTENTIAL SPILL COULD ENTER; OR IF UNNAMED TRIBUTARY, THEN FIRST NAMED WATERBODY DOWNSTREAM *(if known)*
Overpeck Creek, Bergen County sewage System

10. COMMENTS *(Include comments by owner/operator - write on back or attach extra sheets if needed)*
desk review

11a. SPCC NO.

11b. CASE NO.
36-81

11c. NPDES NO. ☐ NOT AVAILABLE
N/A

12a. INSPECTOR *(sign)*
Henry M. Wheat

12b. DATE
15 June 1982

12c. INSPECTOR *(print)*
Henry M. Wheat

EPA Form 7500-53 (9-80)

INSTRUCTIONS

1. Trade name of facility and its precise location, using geographical latitude and longitude if necessary.
2. If owner and operator are different persons, give information for both. State relation between them - is operator cosignee, leasee, or employee? Who is responsible for SPCC?
3. Note capacity and whether tanks are full or not. Note tanks which store alternate oils. Check lube storage - whether buried or above-ground *(latter more likely).*
4. Note adequacy of Plan; if inadequate, state specific defects. Use 10. below for details.
5. Actual date of visit to facility.
6. Include state in which engineer is registered. If Plan was amended and the amended Plan certified by a different engineer, list information for all engineers.
7. List for original Plan and any amended Plans.
8. Summary of deficiencies in Plan implementation. Discuss this with operator and record his opinions and comments in 10. below.
9. Specify distance and direction to nearest named stream, river, lake, bayou, estuary, etc. which will receive runoff from the facility. If facility runoff goes to storm drain, ultimate receiving water should be named.
10. Space for comments by inspector and operator. Inspector should briefly list SPCC equipment actually in use at time of inspection. If facility was not in compliance, inspector should include expected dates of Plan preparation and/or implementation.
11. SPCC No. refers to national EPA Data Bank. Case No. refers to Regional EPA designation.
12. Date on which Field Sheet was actually completed.

10. COMMENTS *(continued from other side)*

B. SPCC INSPECTION SUMMARY SHEET

SPCC NO.	CASE NO.	DATE OF INSPECTION
	36-81	15 June 1982

NAME OF INSPECTOR *(Signature)*: Henry M. Wheat

DATE OF DOCUMENTATION REPORT:

NAME OF INSPECTOR *(Print)*: Henry M. Wheat

NPDES NO.: N/A

1. FACILITY

a. COMPANY: Pfister Chemical Inc.

ADDRESS: Rt # 46

TELEPHONE: (201) 945-5400

CITY	STATE	ZIP CODE
Ridgefield	NJ	07657

FACILITY NAME: Pfister Chemical Inc.

b. FACILITY LOCATION: Same

PARENT CORPORATION:

ADDRESS:

CITY	STATE	ZIP CODE

c. WATER BODY PROTECTED: Overpeck Creek, Bergen County Sewer System

2. PURPOSE

INITIATION: [X] Routine Surveillance [ ] Coast Guard Information [ ] Spill Report [ ] Citizen Information [ ] Other *(specify):*

TYPE: [X] Plan Preparation [ ] Plan Implementation [ ] Follow-up [ ] Plan Amendment

3. INSPECTION

INDIVIDUAL CONTACTED	TITLE
INDIVIDUAL CONTACTED	TITLE

NOTIFICATION:

4. FINDINGS

SOURCE IN APPARENT COMPLIANCE WITH SPCC REQUIREMENTS:

- [X] Yes
  - [X] Have adequate plan
  - [ ] Not subject to regulations
    - [ ] Insufficient storage
    - [ ] No reasonable spill expectation
  - [ ] Plan fully implemented
  - [ ] New facility operational less than 6 months
- [ ] No
  - [ ] No plan
  - [ ] Plan not properly certified
  - [ ] Plan does not have management approval
  - [ ] Plan not maintained at facility manned 8 hrs/day
  - [ ] Inadequate plan *(detailed SPCC Plan review attached)*
  - [ ] Plan not fully implemented
  - [ ] Plan not reviewed within 3 years
- [ ] Other

5. ATTACHMENTS *(None required if facility in apparent compliance)*

	NONE	ATTACHED	ALREADY ON FILE
*Detailed Observations	[ ]	[ ]	[ ]
*Photographs	[X]	[ ]	[ ]
Slides	[X]	[ ]	[ ]
Map	[X]	[ ]	[ ]
*Field Drawing	[X]	[ ]	[ ]
*Comments	[ ]	[X]	[ ]
Telephone Conversations	[X]	[ ]	[ ]
*SPCC Plan	[ ]	[ ]	[X]

**(ALL REQUIRED IF FACILITY IS NOT IN APPARENT COMPLIANCE. If photos not permitted, check "None" and explain. Add "SPCC Plan" to List of Attachments when appropriate.)*

C. DETAILED SPCC DOCUMENTATION

SEE INSTRUCTIONS ON PAGE 8

FACILITY	DATE OF INSPECTION
Pfister Chemical Inc.	15 June 82

1. FACILITY DESCRIPTION

1a. TYPE OF BUSINESS/OPERATION

Chemical Process company

1b. FACILITY OIL STORAGE

30,000 gallons #4 aboveground

1c. PREVENTION MEASURES PROVIDED

concrete containment dikes, 110% of tank volume

cooling water lagoons

process wastewater system

1d. APPEARANCE OF FACILITY *(housekeeping)*

N/A

desk review

1e. PAST SPILL HISTORY

No previous spills

2. RECEIVING WATER *(should a spill occur)*

2a. NAME AND/OR DESCRIPTION

Overpeck Creek

&

Bergen County Sewer System

- [x] Perennial
- [ ] Intermittent
- [ ] Water present at time of inspection
- [ ] Inspector traced discharge to receiving water
- [ ] Inspector traced apparent drainage path to receiving water
- [ ] Receiving water identified by company representative
- [ ] Receiving water identified from topo maps
- [ ] Receiving water identified by other means *(specify):*

2b. PROBABLE FLOW PATH TO RECEIVING WATER

Stated in plan.

O.1 could flow west to cooling water lagoons, then to overpeck Creek

-or-

O.1 could flow east to process waste water plant and to Bergen County sewer system

2c. CLIMATIC INFORMATION FROM OWNER/OPERATOR

N/A

desk review

3. COMMENTS

none

Plan apprars to be well thought out and complete.

5. SPCC AMENDMENT RECOMMENDATIONS *(Amendment Inspections only)*

none

6. FIELD DRAWINGS (Attach more sheets if needed, and show north arrow or other orientation)

N/A

desk review

FACILITY	INSPECTION DATE
INSPECTOR	

7. PHOTOGRAPHS *(Attach more sheets if needed)*	
SUBJECT	FACILITY
PHOTOGRAPHER	WITNESSES
WITNESSES	WITNESSES
DATE/TIME/DIRECTION	CAMERA/FILM/ATTACHMENTS
SUBJECT	FACILITY
PHOTOGRAPHER	WITNESSES
WITNESSES	WITNESSES
DATE/TIME/DIRECTION	CAMERA/FILM/ATTACHMENTS

ATTACH PHOTOGRAPHS HERE

N/A

desk review

INSTRUCTIONS

Page 1: **FACILITY DESCRIPTION**

(a) Make detailed in narrative style; use extra sheets if needed.

(b) Include all storage; indicate capacity and actual amount and type of oil in each tank, including tanks not in use - above-ground or buried. Indicate percent of oil in mixed storage and annual throughput where possible. If this information is included on attached drawing or lists, state this here.

(c) Describe all types and adequacy of prevention measures - dikes, catchment areas, drainage systems, separators, tank level alarm systems, drainage pumps, etc. Describe major security measures taken - locks, guards, fencing, etc.

(d) Describe maintenance at facility. Use such terms as "neat and well-maintained", "messy and poorly maintained" etc. Describe any unsatisfactory maintenance such as oil pools, broken dikes, etc.

(e) Obtain statement about past spills at this facility; observe drain controls; look for evidence of past spills.

Page 2: **RECEIVING WATER**

(a) This should be a recognizable river, stream, lake, estuary, etc. which can be expected to contain water at least part of the year.

(b) Explicitly describe, using approx. distances in meters or kilometers ***(feet or miles)***, **all of the drainage paths from facility to receiving water or storm drain in (a).**

(c) Add here any statements obtained about annual rainfall, runoff, flooding, etc.

Page 3: **COMMENTS**

Describe soil conditions as they relate to spill runoff and whether spills have a reasonable chance of reaching drainage channels, storm drains or waterways. Obtain statements from owner/operator which indicate whether the person is aware of 40 CFR 112.

Page 4: **SPCC PLAN REVIEW**

State whether facility has an SPCC Plan and whether it is adequate. Describe in detail any inadequacies in SPCC Plan or its implementation. Include references to pertinent paragraphs of Spill Prevention Regulations.

Page 5: **SPCC AMENDMENT RECOMMENDATIONS** *(Amendment Inspection only)*

Describe areas of past and potential oil spills and corrective actions, preventive measures and countermeasures carried out in facility. Based on your inspection, will these features of the post-spill SPCC Plan adequately minimize the possibility of recurrence? Why? If not, state recommendations for SPCC Plan amendments in detail - attach quantitative information, drawings, etc.

Page 6: **FIELD DRAWINGS** *(attach more sheets if needed and show north arrow or other orientation)*

Show: all major features with spill potential requiring spill prevention measures; all drainage features that relate to potential spills, such as catch basins, storm drains, channels, ponding areas, dikes, sumps, etc.; the appropriate distances in meters or kilometers ***(feet or miles)*** **along drainage paths from spill potential areas to water course or water body in 2(a).**

Page 7: **PHOTOGRAPHS** *(attach more sheets if needed)*

Show inadequate SPCC features, spills, poor maintenance, proximity to waterways, and so forth. Mount photographs on page 7; attach more sheets if needed.

CONTAINMENT EQUIPMENT/STRUCTURE OR CONTINGENCY PLAN

GENERAL SPCC PREVENTION PLAN CHECKLIST

Secondary containment and/or diversionary structures are used for possible spill sources:

Source Type of Containment or Diversionary Structure

Select from: Dikes, berms, retaining walls, curbing, culverting, gutters, drains, weirs, booms, other barriers, spill diversion, retention ponds and sorbent materials.

dikes, lagoons, wastewater treatment system

If the containment or diversionary structures above are impracticable, state reasons for impracticability: _____

and attach a strong oil spill contingency plan and written commitment of manpower equipment and materials required to expeditiously control and remove any harmful quantity of oil discharged. Check if attached:

Contingency Plan X Written Commitment X

Discussion: plan has full management commitment.
Contractor on spill standby.
Sorbent material available w/personnel trained in deployment

APPLICABLE EPA GUIDELINES
40 CFR PART 112.7

§ 112.7 Guidelines for the preparation and implementation of a Spill Prevention Control and Countermeasure Plan.

The complete SPCC Plan shall follow the sequence outlined below, and include a discussion of the facility's conformance with the appropriate guidelines listed:

(b) Where experience indicates a reasonable potential for equipment failure (such as tank overflow, rupture, or leakage), the plan should include a prediction of the direction, rate of flow, and total quantity of oil which could be discharged from the facility as a result of each major type of failure.

(c) Appropriate containment and/or diversionary structures or equipment to prevent discharged oil from reaching a navigable water course should be provided. One of the following preventive systems or its equivalent should be used as a minimum:

(1) Onshore facilities.
(i) Dikes, berms or retaining walls sufficiently impervious to contain spilled oil
(ii) Curbing
(iii) Culverting, gutters or other drainage systems
(iv) Weirs, booms or other barriers
(v) Spill diversion ponds
(vi) Retention ponds
(vii) Sorbent materials
(2) Offshore facilities.
(i) Curbing, drip pans
(ii) Sumps and collection systems

(d) When it is determined that the installation of structures or equipment listed in § 112.7(c) to prevent discharged oil from reaching the navigable waters is not practicable from any onshore or offshore facility, the owner or operator should clearly demonstrate such impracticability and provide the following:

(1) A strong oil spill contingency plan following the provision of 40 CFR Part 109.

(2) A written commitment of manpower, equipment and materials required to expeditiously control and remove any harmful quantity of oil discharged.

NONPRODUCTION - ONSHORE

	YES	NO
A. Drainage		
(1) Drains from diked storage areas have valves.	____	X ①
(2) Drain valves are manual, open-and-close design.	____	X ①
(3) Rain water from diked areas is inspected before drainage.	____	X ①
(4) Plant drainage systems are equipped with either:		
a. Ponds, lagoons or catchment basins to retain oil or	X	____
b. A diversion system at the final discharge point which could contain an uncontrolled spill and return the oil to the plant.	X	____
(5) Flow of drainage water between treatment units is by either:		
a. Natural hydraulic flow or	X	____
b. Two "lift" pumps (one a spare and one permanently installed).	____	____

Discussion:

① No drainage from diked areas

40 CFR PART 112.7

(1) *Facility drainage (onshore); (excluding production facilities).* (i) Drainage from diked storage areas should be restrained by valves or other positive means to prevent a spill or other excessive leakage of oil into the drainage system or inplant effluent treatment system, except where plan systems are designed to handle such leakage. Diked areas may be emptied by pumps or ejectors; however, these should be manually activated and the condition of the accumulation should be examined before starting to be sure no oil will be discharged into the water.

(ii) Flapper-type drain valves should not be used to drain diked areas. Valves used for the drainage of diked areas should, as far as practical, be of manual, open-and-closed design. When plant drainage drains directly into water courses and not into wastewater treatment plants, retained storm water should be inspected as provided in paragraph (e)(2)(iii) (B, C and D) before drainage.

(iii) Plant drainage systems from undiked areas should, if possible, flow into ponds, lagoons or catchment basins, designed to retain oil or return it to the facility. Catchment basins should not be located in areas subject to periodic flooding.

(iv) If plant drainage is not engineered as above, the final discharge of all in-plant ditches should be equipped with a diversion system that could, in the event of an uncontrolled spill, return the oil to the plant.

(v) Where drainage waters are treated in more than one treatment unit, natural hydraulic flow should be used. If pump transfer is needed, two "lift" pumps should be provided, and at least one of the pumps should be permanently installed when such treatment is continuous. In any event, whatever techniques are used facility drainage systems should be adequately engineered to prevent oil from reaching navigable waters in the event of equipment failure or human error at the facility.

B. Bulk Storage Tanks	YES	NO
(1) Tank material and construction are compatible with fluid stored.	X	
(2) Secondary containment volume is greater than the largest single tank capacity plus an allowance for rainwater.	X	
(3) Drainage of rainwater from diked areas into open waters, by-passing inplant treatment, is accomplished according to the following:		
a. Normally the by-pass valve is sealed closed.		X see previous item ①
b. The rainwater is inspected to insure compliance with water quality standards.		X "
c. The by-pass valve is opened and resealed under responsible supervision.		X "
d. Records are kept of bypassing and drainage events.		X "
(4) Buried metallic storage tanks:		
a. New tanks are coated and wrapped to reduce corrosion.		
b. Cathodic protection is provided for tanks as necessary.		
c. Tanks are pressure tested on a scheduled, periodic basis.		
(5) Partially buried metallic tanks are avoided (for stored oil) unless adequate shell coating is provided for the buried portion.		

(2) *Bulk storage tanks (onshore); (excluding production facilities).* (i) No tank should be used for the storage of oil unless its material and construction are compatible with the material stored and conditions of storage such as pressure and temperature, etc.

(ii) All bulk storage tank installations should be constructed so that a secondary means of containment is provided for the entire contents of the largest single tank plus sufficient freeboard to allow for precipitation. Diked areas should be sufficiently impervious to contain spilled oil. Dikes, containment curbs, and pits are commonly employed for this purpose, but they may not always be appropriate. An alternative system could consist of a complete drainage trench enclosure arranged so that a spill could terminate and be safely confined in an in-plant catchment basin or holding pond.

(iii) Drainage of rainwater from the diked area into a storm drain or an effluent discharge that empties into an open water course, lake, or pond, and bypassing the in-plant treatment system may be acceptable if:

(A) The bypass valve is normally sealed closed.

(B) Inspection of the run-off rain water ensures compliance with applicable water quality standards and will not cause a harmful discharge as defined in 40 CFR 110.

(C) The bypass valve is opened, and resealed following drainage under responsible supervision.

(D) Adequate records are kept of such events.

(iv) Buried metallic storage tanks represent a potential for undetected spills. A new buried installation should be protected from corrosion by coatings, cathodic protection or other effective methods compatible with local soil conditions. Such buried tanks should at least be subjected to regular pressure testing.

(v) Partially buried metallic tanks for the storage of oil should be avoided, unless the buried section of the shell is adequately coated, since partial burial in damp earth can cause rapid corrosion of metallic surfaces, especially at the earth/air interface.

	YES	NO
(6) Aboveground tanks are tested by one of the following methods:		
a. Hydrostatic testing	X	
b. Visual inspection	X	
c. Shell thickness testing (comparison records of shell thickness reduction are maintained)		X
(7) Internal heating coil leakage is controlled by one or more of the following:	N/A	
a. Monitoring the steam return or exhaust lines for oil.		
b. Passing the steam return or exhaust lines through a settling tank, skimmer or other separation system.		
c. Installing external heating systems.		
(8) All bulk storage tanks are externally inspected on a monthly basis (including seams, rivets, bolts, gaskets, nozzle connections, valves, connected pipelines and tank foundation and/or supports) for leaks or failures.	X	
(9) Tanks are fail safe engineered by one of the following:		
a. High liquid level alarms with an audible signal at a constantly manned station.		
b. High liquid level pump cutoff devices.	X	
c. Direct communication between the tank gauger and pumping station.		
d. One fast means of determining the liquid level in tanks (such as digital computers, telepulse or direct visual gauges).	X	

(vi) Aboveground tanks should be subject to periodic integrity testing, taking into account tank design (floating roof, etc.) and using such techniques as hydrostatic testing, visual inspection or a system of non-destructive shell thickness testing. Comparison records should be kept where appropriate, and tank supports and foundations should be included in these inspections. In addition, the outside of the tank should frequently be observed by operating personnel for signs of deterioration, leaks which might cause a spill, or accumulation of oil inside diked areas.

(vii) To control leakage through defective internal heating coils, the following factors should be considered and applied, as appropriate.

(A) The steam return or exhaust lines from internal heating coils which discharge into an open water course should be monitored for contaminatic or passed through a settling tank, skimmer, or other separation or retention system.

(B) The feasibility of installing an external heating system should also be considered.

(viii) New and old tank installations should, as far as practical, be fail-safe engineered or updated into a fail-safe engineered installation to avoid spills. Consideration should be given to providing one or more of the following devices:

(A) High liquid level alarms with an audible or visual signal at a constantly manned operation or surveillance station; in smaller plants an audible air vent may suffice.

(B) Considering size and complexity of the facility, high liquid level pump cutoff devices set to stop flow at a predetermined tank content level.

(C) Direct audible or code signal communication between the tank gauger and the pumping station.

(D) A fast response system for determining the liquid level of each bulk storage tank such as digital computers, telepulse, or direct vision gauges or their equivalent.

(E) Liquid level sensing devices should be regularly tested to insure proper operation.

(ix) Plant effluents which are discharged into navigable waters should have disposal facilities observed frequently enough to detect possible system upsets that could cause an oil spill event.

(x) Visible oil leaks which result in a loss of oil from tank seams, gaskets, rivets and bolts sufficiently large to cause the accumulation of oil in diked areas should be promptly corrected.

(xi) Mobile or portable oil storage tanks (onshore) should be positioned or located so as to prevent spilled oil from reaching navigable waters. A secondary means of containment, such as dikes or catchment basins, should be furnished for the largest single compartment or tank. These facilities should be located where they will not be subject to periodic flooding or washout.

NONPRODUCTION - ONSHORE (Continued)

	YES	NO
e. Liquid level sensing devices are inspected and tested on a scheduled, periodic basis.	X	
(10) Frequent plant effluent observations to detect upsets are made.	X	
(11) Mobile storage tanks are properly positioned to prevent spill reaching navigable water.	N/A	

Discussion: _____

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77

Intra-Facility Transfer Operations, Pumping and Inplant Process

A. Buried Pipelines

(1) Pipelines are wrapped and coated to reduce corrosion.	X	
(2) Cathodic protection is provided for pipelines as needed.	X	
(3) When a pipeline section is exposed, it is inspected and corrective action taken as necessary.	X	

40 CFR PART 112.7

(3) *Facility transfer operations, pumping, and in-plant process (onshore); (excluding production facilities).* (i) Buried piping installations should have a protective wrapping and coating and should be cathodically protected if soil conditions warrant. If a section of buried line is exposed for any reason, it should be carefully examined for deterioration. If corrosion damage is found, additional examination and corrective action should be taken as indicated by the magnitude of the damage. An alternative would be the more frequent use of exposed corridors or galleries.

NONPRODUCTION - ONSHORE (Continued)

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	YES	NO
B. Pipeline terminal connections are capped or blank-flanged and marked if the pipeline is not in service or on standby service for long periods.	X	

Discussion: _____

C. Pipe supports are designed to minimize abrasion and corrosion and allow for expansion and contractions. — X —

Discussion: _____

D. All aboveground valves and pipelines are inspected on a scheduled, periodic basis (including flange joints, valve glands and bodies, catch pans, pipeline supports, looking of valves, and metal surfaces.) — N/A —

Discussion: no overhead pipes

E. Vehicles entering the facility are inspected and/or warned to avoid damaging aboveground piping. — N/A —

Discussion: no overhead pipes

(ii) When a pipeline is not in service, or in standby service for an extended time the terminal connection at the transfer point should be capped or blank-flanged, and marked as to origin.

(iii) Pipe supports should be properly designed to minimize abrasion and corrosion and allow for expansion and contraction.

(iv) All aboveground valves and pipelines should be subjected to regular examinations by operating personnel at which time the general condition of items, such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, looking of valves, and metal surfaces should be assessed. In addition, periodic pressure testing may be warranted for piping in areas where facility drainage is such that a failure might lead to a spill event.

(v) Vehicular traffic granted entry into the facility should be warned verbally or by appropriate signs to be sure that the vehicle, because of its size, will not endanger above ground piping.

Discussion (cont'd)_____

	YES	NO
D. Intra-Facility Tank Car & Tank Truck Loading/Unloading		
A. Loading/unloading procedures meet the minimum requirements and regulations of the Department of Transportation.	X	
B. The unloading area has quick drainage system.	X	
C. The containment system will hold maximum capacity of any single tank truck loaded/unloaded in the plant.	X	
D. An interlocked warning light or physical barrier system or warning signs are provided in the loading/unloading areas to prevent vehicular departure before disconnect of transfer lines.	X	
E. Drains and outlets on tank trucks and tank cars are checked for leakage before loading or unloading.	X	

Discussion: Boiler room engineer also present at all transfer operations

(4) *Facility tank car and tank truck loading/unloading rack (onshore).* (i) Tank car and tank truck loading/unloading procedures should meet the minimum requirements and regulation established by the Department of Transportation.

(ii) Where rack area drainage does not flow into a catchment basin or treatment facility designed to handle spills, a quick drainage system should be used for tank truck loading and unloading areas. The containment system should be designed to hold at least maximum capacity of any single compartment of a tank car or tank truck loaded or unloaded in the plant.

(iii) An interlocked warning light or physical barrier system, or warning signs, should be provided in loading/unloading areas to prevent vehicular departure before complete disconnect of flexible or fixed transfer lines.

(iv) Prior to filling and departure of any tank car or tank truck, the lowermost drain and all outlets of such vehicles should be closely examined for leakage, and if necessary, tightened, adjusted, or replaced to prevent liquid leakage while in transit.

	YES	NO
Inspections and Records		
A. The required inspections follow written procedures.	X	
B. The written procedures and a record of inspections, signed by the appropriate supervisor, are included in the SPCC plan.	X	

Discussion: _____

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Security		
A. Plants handling or storing oil are fenced.	X	
B. Entrance gates are locked and/or guarded when the plant is unattended or not in production.	X	
C. Any valves which permit direct outward flow of a tank's contents are locked closed when in non-operating or non-standby status.	X	
D. Starter controls on all oil pumps in non-operating or non-standby status are locked or electrically isolated in the "off" position.	X	
E. The loading/unloading connections of oil pipelines are capped or blank-flanged when not in service or on standby service for extended periods.	X	

(8) *Inspections and records.* Inspections required by this part should be in accordance with written procedures developed for the facility by the owner or operator. These written procedures and a record of the inspections, signed by the appropriate supervisor or inspector, should be made part of the SPCC Plan and maintained for a period of three years.

(9) *Security (excluding oil production facilities).* (i) All plants handling, processing, and storing oil should be fully fenced, and entrance gates should be locked and/or guarded when the plant is not in production or is unattended.

(ii) The master flow and drain valves and any other valves that will permit direct outward flow of the tank's content to the surface should be securely locked in the closed position when in non-operating or non-standby status.

(iii) The starter control on all oil pumps should be locked in the "off" position or located at a site accessible only to authorized personnel when the pumps are in a non-operating or non-standby status.

(iv) The loading/unloading connections of oil pipelines should be securely capped or blank-flanged when not in service or standby service for an extended time. This security practice should also apply to pipelines that are emptied of liquid content either by draining or by inert gas pressure.

RPA file.

SPCC PLAN

PFISTER CHEMICAL INC.

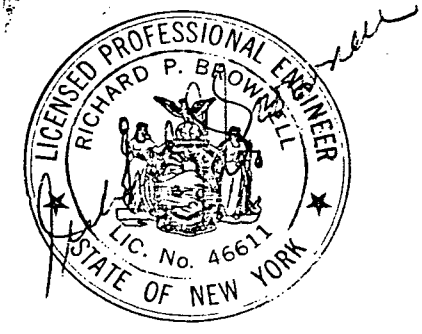
SPILL PREVENTION AND COUNTERMEASURE PLAN

SEPTEMBER 1981

INDEX

Facility Name	Pfister Chemical Inc.
Owner	Albert Bendelius
Vice President	Edward S. O'Connor
Classification	#2815
Nearest Navigable Water	Overpeck Creek, Bergen County Sewer System
Spill History Over Last Five Years	None
Responsible Official	Richard Braun (Plant Manager)
Management Official	Arthur Gusmano (Technical Director)

In accordance with 40 CFR 112.3d, this plan has been reviewed by a Registered Professional Engineer. The facility has been examined and the engineer familiar with the provisions of 40 CFR 112.3 attests that this SPCC Plan has been prepared in accordance with good engineering practices. This certification does not relieve the operator of his duty of implementation of this plan. This plan will be reviewed and updated every three years.



Plan reviewed by:

Richard P. Brownell, P.E.
Malcolm Pirnie, Inc.
2 Corporate Park Drive
White Plains, New York 10602

SPCC PLAN

SPILL PREVENTION AND COUNTERMEASURE PLAN

This plan addresses the prevention and countermeasures taken to insure that oil from the two 15,000 gal. bulk storage tanks present at the company site will not be released and if released, what measures will be taken and equipment used to prevent #4 fuel oil from getting into a navigable waterway, in this case, the Bergen County Sewer System and Overpeck Creek. The plan has the full approval of management and the line representatives of management to commit the necessary resources to accomplish the objectives set forth above.

DESCRIPTION OF BULK STORAGE OIL TANKS

The two steel horizontal oil tanks are mounted on concrete saddles and surrounded by a 12" reenforced concrete dike (29' X 35' X 4'). The volume capacity of the diked area is 110% of the combined capacity of the two tanks, as in the regulations, sufficient to contain the entire contents of both plus sufficient free board for precipitation. The lighting in the area during the night is sufficient to see an accumulation of oil within the dike area in the event of a leak.

FACILITY DRAINAGE

All storm drains are directed into the cooling water lagoon or the process waste water system which flows into the Bergen County Sewer System. There are no drains from the diked area. (Storm water evaporates.) DOUBTFUL

PREDICTION OF DIRECTION, RATE OF FLOW, TOTAL QUANTITY (30,000 GALS.) FOR POTENTIAL DISCHARGE

1. In the case of a major incident where the tanks and reinforced concrete dike are ruptured, the maximum 30,000 gals. of oil might flow to the west of the tanks into the cooling water lagoon or to the east into the process waste water trench and system.

   a.) If oil flows into the cooling water lagoon, the oil will be contained in the lagoon since the only outlet is through a 12" below surface pipe which leads to the cooling circulating system. The spilled oil will remain floating well above the outlet pipe. Should the level drop below the water outlet pipe and the cooling water circulating pumps remained on, the spilled oil would flow through the cooling system and finally into the process waste water lagoon.

b.) If spilled oil flows east into the process waste water trench, it will flow south to a nearby catch basin, then further south to a final catch basin and then be pumped into the first process waste water lagoon which is constricted at one end and can be sealed off by an adjustable weir. If the weir were not adjusted, the oil would finally flow into the Bergen County Sewer System.

2. Spill resulting from tank loading operation.

3. Spill resulting from failure of tanks. (Spill would be contained within the dike area).

OIL SPILL CONTINGENCY PLAN
(ACTION TO BE TAKEN IN THE CASE OF AN OIL SPILL)

In the case of any spill, the emergency coordinator will be notified immediately.

1. If the dike area fills with leaked oil, the coordinator will assign personnel to monitor the dike to be sure the oil is contained within the dike area. Arrangments will be made to pump out and dispose of the leaked oil. The coordinator will make certain that the contractor used to pump out the oil is properly licensed and reputable. A list of approved spill contractors is included in the appendix.

2. Small spills will be absorbed with speedy-dry, swept and shoveled into steel drums for proper disposal. A pallet of speedy-dry is available in the shop.

3. In the case of a major oil spill, either from a damaged loading truck or major incident where the dike does not contain oil from the two storage tanks, the following procedure will be followed:

   a.) Notify Emergency Coordinator.

   b.) Coordinator will give instructions to turn off power to cooling water pumps to eliminate the possibility of oil getting out of the cooling lagoon.

   c.) Instructions to raise the weir at the south end of the first waste water lagoon will be given. This action will insure that no oil can get into the Bergen County Sewer System.

d.) If oil has been spilled on either side - east or west of the tanks and dike area or loading area, the spilled oil can be flushed into either the cooling water lagoon or the process waste water trench to isolate and collect the spilled oil. The tank, dike and loading area is flat; natural drainage would allow oil to flow in either direction east or west.

e.) The oil in the cooling water lagoon will be pumped off the surface by a contractor such as found in the appendix. A 3M type 270 Boom for Oil spills stored in the plant shop will be used to aid in recovery of oil from surface of cooling water lagoon.

f.) When all oil spilled on ground is flushed into the waste water trench, the oil water mixture will be pumped into the first waste water lagoon making sure that the level of the lagoon is well below the weir at the south end of the lagoon. When all the oil is flushed out of the waste water trench system into the first waste water lagoon, the oil spill boom will be used to aid in collecting the floating oil and facilitate recovery by sucking or pumping into contractor's truck.

LOADING OF OIL INTO STORAGE TANK

One possible source of an oil spill may occur during the loading of the oil tank. To prevent the possibility of a spill, the following procedure is followed:

1. Before loading either oil tank, all drivers must first check with the boiler room engineer. The boiler room engineer remains present during the loading operation and truck departure.

2. The tank to be loaded is measured before loading to determine the quantity of oil that can be accepted.

3. Prior to filling oil storage tank and departure of oil delivery truck, the bottom outlet and hose connection to the truck are closely examined by the boiler room operator for leakage and if necessary, tightened or replaced to prevent oil leakage while in transit or filling of tank.

3. Prior to disconnect, the boiler room engineer checks to be sure that the oil truck pump is off and the drip pan is in place beneath the loading connection.

   Note: The oil tanks are loaded from the top and a one-way valve prevents any remaining oil in the pipe from flowing out and over filling the drip pan.

INSPECTION AND RECORDS

1. Inspection of oil tanks, the dike surrounding the tanks and the loading area.

   A monthly inspection of oil storage tanks is conducted by the Boiler Room Foreman, presently Henry Rayfield. The tanks are inspected for leaks in bottom flanges and general integrity of tanks. The concrete is also inspected for cracks and structural integrity.

   A monthly report is sent to the Technical Director who examines the report and acts to remedy any potential problems with the oil storage tanks and dike.

   The report is filed in the RCRA Operating Record Drawer as part of the SPCC Plan in the Technical Director's office in the specific file labeled "Inspections Completed". Records will be kept for a period of three years.

   Note: There is always a man on duty at the facility - 24 hours per day, all year long.

EMERGENCIES

In case of oil spill, chemical upset, explosion, fire or major accident, Pfister personnel are prepared to act quickly to assure the safety of everyone and to minimize the extent of the damage caused by the mishap. All emergency response personnel know the procedure for reporting an oil spill, chemical upset, explosion, fire or major accident and for requesting outside fire, police or medical assitance.

Emergency Response Personnel:

The following personnel are qualified to act as emergency coordinators for oil spill prevention and have authority to commit financial and other resources needed during an emergency. Shift supervisors and plant workers have been instructed to contact immediately one of the following coordinators should an emergency situation arise:

1. Primary Emergency Coordinator - Richard Braun, General Production Manager
   Home phone - (201) 664-4747

2. Alternate Emergency Coordinator - Nicholas DiMenna, Plant Engineer
   Home phone - (201) 263-0020

3. Alternate Emergency Coordinator - Arthur Gusmano, Technical Director
   Home phone - (201) 839-4349

The following should be contacted during an emergency situation, as appropriate for the type of accident:

1.	Ridgefield Fire Dept.	- Tel.	943-5210
2.	Ridgefield Police Dept.	- "	943-5210
3.	Englewood Hospital	- "	894-3000
4.	Ridgefield Ambulance Corp.	- "	943-5577
5.	CHEMTREC - (for chemical emergency advice and information)	- "	800-424-9300
6.	R & R Services (SCA) (permitted to remove drummed wastes)	- "	694-0595
7.	National Response Center (must be notified if an emergency can effect human health or the environment outside the facility, eg. release to ground water).	- "	800-424-8802

The following agencies and individuals have been notified by phone and a copy of this Contingency Plan has been sent to them:

1. Ridgefield Fire Dept. -
   Chief Paul Elenio
2. Ridgefield Police Dept. -
   Chief George Corvelli
3. Englewood Hospital -
   Director of Safety and Security
4. M & R Construction Co. -
   Mr. Donald Miller - Tel. 943-1670

5. Ridgefield Ambulance Corp. -
Mr. Jim Metz - Tel. 943-5577

The purpose of the plan was explained to each individual and full cooperation was indicated in an emergency.

In accordance with 40 CFR 112.3, if more than 1,000 gallons of oil is discharged into or upon the navigable waters of the United States or adjoining shorelines in a single spill event, or discharged in harmful quantities as defined in 40 CFR Part 110, or in reportable quantities as defined in Sec. 311 FWPCA, the Regional Administrator will be notified within 60 days and the information requested in 40 CFR 112.4 will be submitted.

PERSONNEL TRAINING

In accordance with 40 CFR Part 112, the following Training Plan has been implemented to insure rapid and effective action to prevent the possibility of oil discharge into navigable water ways. The possible release is into the Bergen County Sewer System or into Overpeck Creek which flows into the Hackensack River.

Operating Personnel (Boiler Room)

Henry Rayfield
Robert Parker
Ricardo Valdez
Edward Kanson

All of the above personnel are qualified to accept oil deliveries and make inspections of the oil delivery trucks, the oil storage tanks and the dike surrounding the two oil storage tanks.

One of the four boiler room operators is on duty 24 hours per day, 7 days per week, all year long. A monthly inspection of the storage tanks and dike is done by one of the above. One of the above is responsible for inspecting the oil delivery truck before and after loading.

Training

Training of the boiler room personnel has been done by the Plant Engineer, Nicholas DiMenna.

Plant Engineer - Nicholas DiMenna:

A graduate engineer with 25 years experience at this facility. He is responsible for all

engineering and maintenance operations. It is the Plant Engineer's responsibity to train and insure safety procedures for the training of personnel involved in the oil storage facility and loading operations and inspection of same. He is also Alternate Emergency Coordinator.

Spill prevention briefings are held bi-annually. Briefings highlight and describe potential spill events or failures, malfunctioning components and recently developed precautionary measures.

SECURITY

As required under 40 CFR Section 112.14, the following security measures are now in place:

1. The entire perimeter of the plant is fenced.

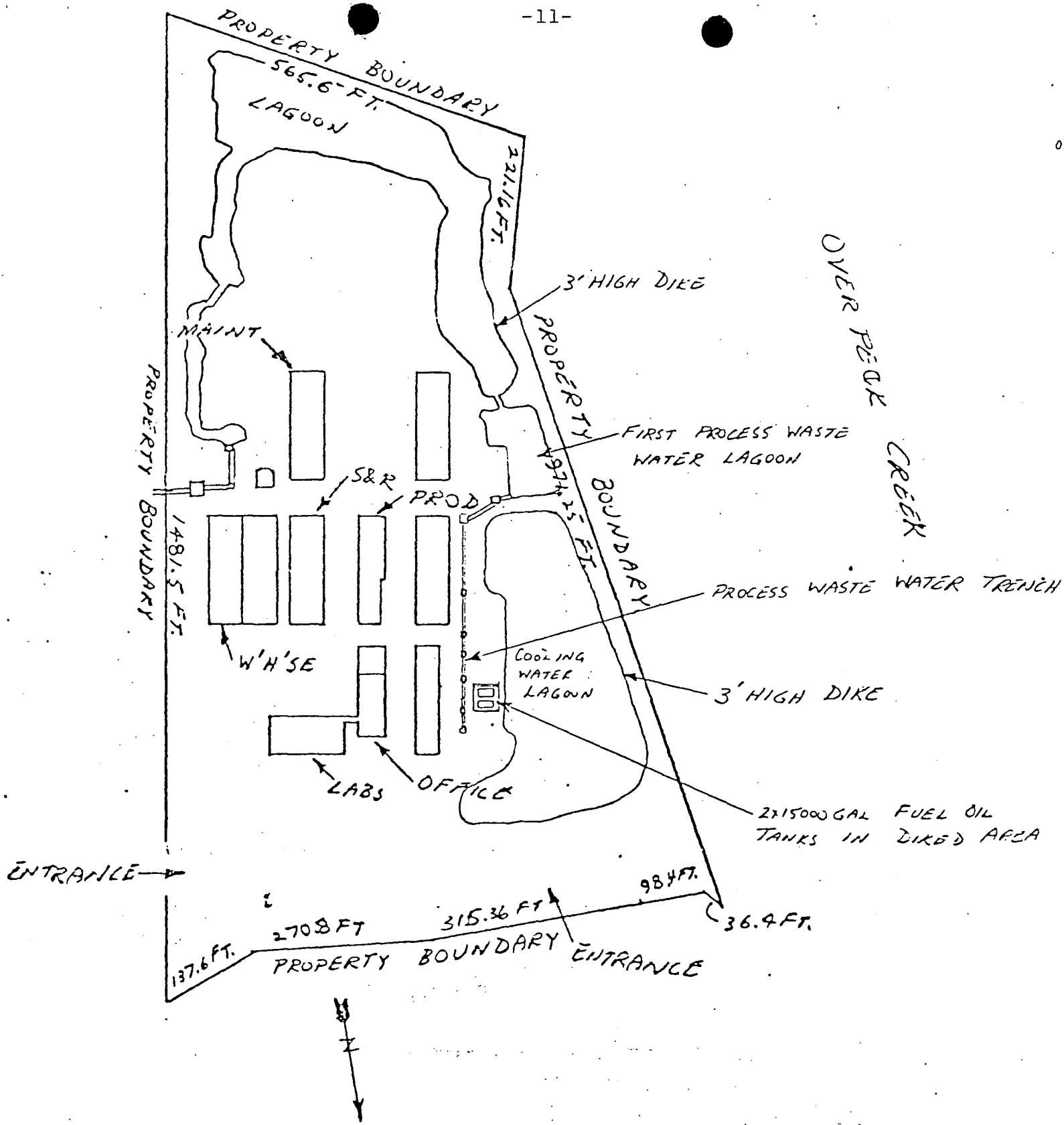
2. The gates are locked when the plant is not in operation.

3. The front Route 46 gate is locked after 6:00 PM under normal operations to reduce access by unauthorized people.

4. When the plant is not in operation, the boiler room attendant makes hourly rounds throughout the plant checking in with the ADT Security System (American Dial Telegraph). The boiler room attendant is instructed to report anything unusual in the plant.

5. During normal operations, the shift supervisors are responsible for seeing that security is maintained and no unauthorized personnel are allowed in the plant. The supervisors are instructed to call the Ridgefield Police Dept. if a suspicious person is discovered or any other serious problem occurs.

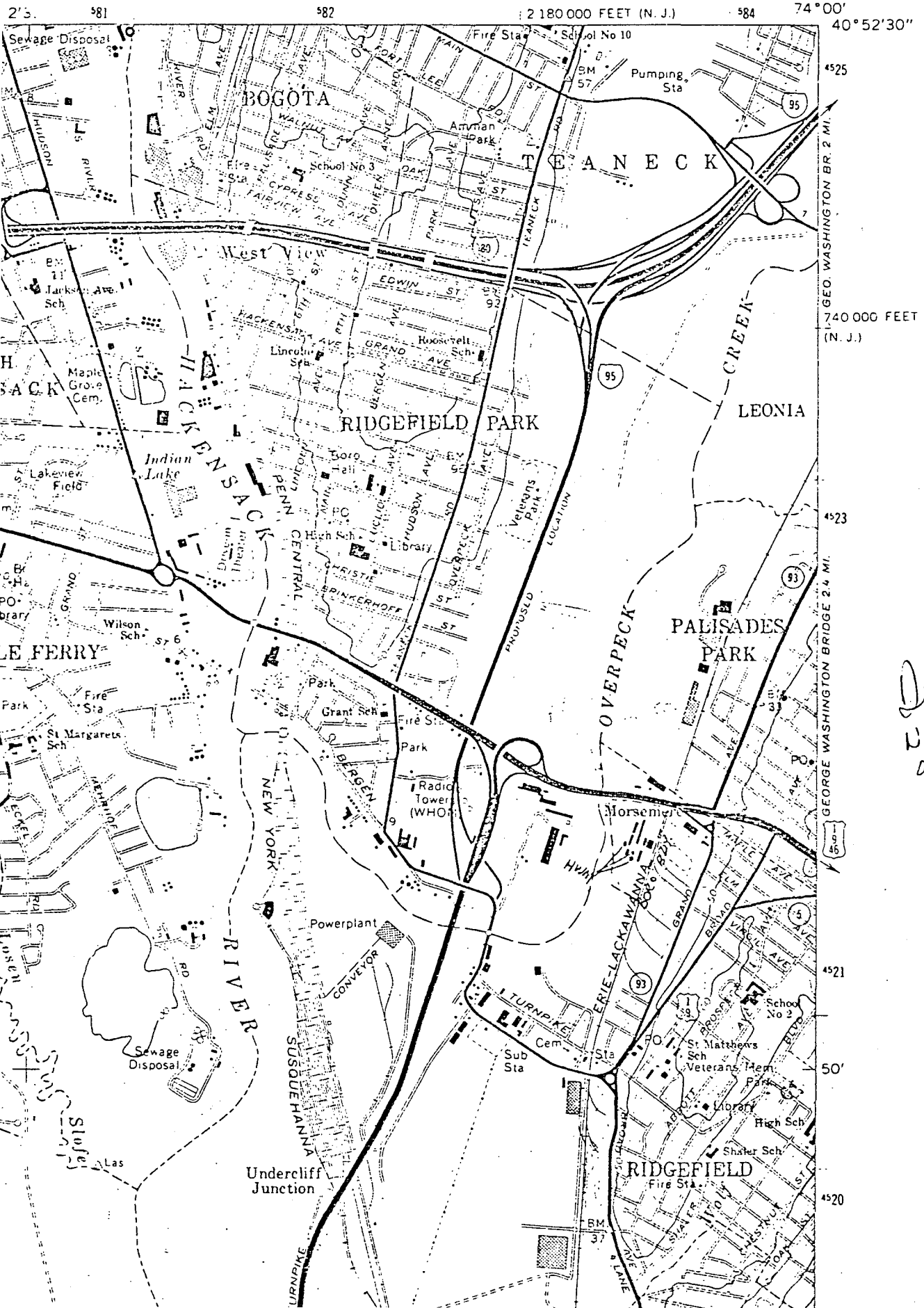
6. Starter controls for oil pumps are indoors and the building is locked when not in use.



SCALE: 1 INCH = 200 FEET

WEEHAWKEN QUADRANGLE
NEW JERSEY – NEW YORK
7.5 MINUTE SERIES (TOPOGRAPHIC)

6265 IV NW (YONKERS)



Draw North arrow

PFISTER CHEMICAL INC. - RIDGEFIELD FACILITY

VISUAL INSPECTIONS

Date	Operator	Is oil present on the				Source and quantity of oil	Corrective Actions
		pavement?	earth?	Storm sewer flow?	Sides of sewer or lagoon?		

PFISTER CHEMICAL INC. - RIDGEFIELD FACILITY

HEATING OIL LOG SUMMARY

Date	Oil in Storage			Oil Consumed			Oil Burned	Difference
	Tank 1	Tank 2	Total	Tank 1	Tank 2	Total		

Operator: ____________ Oil Company: ____________ Tel. No: ____________

APRIL 1981 U.S. EPA II EMERGENCY RESPONSE & HAZARDOUS

MATERIALS INSPECTION BRANCH

LIST OF SPILL CONTRACTORS

Company	Materials Handled	States Covered	USCG Approved
1. AAA Pollution Control 40-10 Crescent Street Long Island City, NY 11101 212-729-2122	O, EXSQ, PCB, PESTSQ	NY, NJ, CT	Note - 9th district does not list approved contractors. --- 3
2. ACES (Formerly Ace Oil) 876 Otter Creek Road Oregon, OH 43616 419-726-1521	O, HM, L, T&D	All	---
3. Advanced Environmental Technology Corp. (Emergency Technical Services Corp.) 520 Speedwill Avenue Morris Plains, NJ 07950 201-539-7111 (24 hr. recorder)	HM, PCB, EX, L	NY, NJ, CT, So.MA, PA	---
4. Aline Environmental Service P.O. Box 6396 Bridgewater, NJ 08807 201-526-4847 " 272-2781 " 725-4534	O, HM	NY, NJ, CT, MA, PA	---
5. AMO Pollution Service, Inc. 2743 Noblestown Road Pittsburgh, PA 15205 412-921-8486 " 331-5350	O, HM, RAD (Low Level)	NY, NJ, CT, PA	---
6. A.M. Environmental Services, Inc. 1031 Market Street Paterson, NJ 07513 201-345-2855 " 962-4244	O	So. NY, No. NJ	---
7. ~~Exxon~~ Industrial, Inc. AXON (National Environmental Engineers) P.O. Box 93 Iselin, NJ 08830 201-636-1581	O, HM, ASB, T&D	NY, NJ, CT, MA, RI, NH, ME, PA	---
8. C & F Pollution Control 3266 Taylor Street Schenectady, NY 12306 518-355-8873	O, HM (Hauling Only)	NY, MA, CT, VT, NH	---
9. Cecos International, Inc. P.O. Box 619 Niagara Falls, NY 14302 716-731-3281	O, HM, L, PCB, EXSQ	All	---

Company	Materials Handled	States Covered	USCG Approved
10. Chemical Pollution Control 120 South 4th Street Bay Shore, NY 11706 516-586-0333	O, PCB, L (Limited Spills)	NY, NJ, CT	---
11. Chesterfield Associates 5 Country Road Westhampton Beach, NY 11978 516-288-2138	O (Beach Cleanup Specialists)	NY	---
12. Clean Venture, Inc. P.O. Box 418 Linden, NJ 07036 201-225-4130	O, HM, L, T, PESTSQ, PCB	All	3
13. Coastal Services 2 Lincoln Street Linden, NJ 07036 Linden: 201-862-2722 (Hazardous Only) Linden: " 925-6010 (Oil Only) Paulsboro: 609-423-2700	O, HM, L, PCB, PEST	All	3
14. Domermuth Petroleum Equipment and Maintenance Corp. P.O. Box 62 Clarksville, NY 12041 518-768-2214	O, T, T&D	NY, NJ, CT, MA, PA, VT	3
15. Ed Lecarreaux (Formerly Duane Marine Corp. Box 435 Great Kills, Staten Island, NY 10308 212-984-5566	O	NY, NJ, CT, MA, RI	---
16. East Coast Environmental 454 Quinnipiac Avenue New Haven, CT 06513 203-469-2376	O, HM	NY, NJ, CT	3
17. East Coast Pollution Control Inc. Cenco Boulevard P.O. Box 275 Clayton, NJ 609-881-5100	O, T	NY, NJ, CT, MA, PA, DEL	---
18. East Coast Salvage 29th and Adams Avenue Camden, NJ 08105 609-966-4469 (24 hrs.)	O, HM, PCB, EX, RAD	All	3
19. Environmental Cleaning Specialists P.O. Box 1161 Kingston, PA 18704 717-287-4397	O, HM	All	3
20. Fourth Coast Service Corp. Box 84 Waddington, NY 13694 315-388-5909	O, HM, T&D	NY, VT	---

Company	Materials Handled	States Covered	USCG Approved
21. Hitchcock Oil Pollution Systems 40 California Street Bridgeport, CT 06608 203-334-2161	O, DISP Oil	NY, NJ	---
22. Industrial Waste Removal, Inc. 550 Industrial Drive Lewisberry, PA 17339 717-938-6745	O, some HM, ASB & Powders, High Press. Water Decon, Line Cleaning	NY, NJ, PA	3
23. J & J Spill Services P.O. Box 966 Morristown, PA 19404 215-277-4511	O, HM, L, PCB, T&D (No PEST)	NJ, PA, DEL	3
24. Jet Line P.O. Box 180 Stroughten, MA 02072 617-344-2510	O, HM, L, T, TR, Subcontract PCB's	All	3
25. Jet Research P.O. Box 246 Arlington, TX 76010 817-465-2864 FTS Operator = 334-3011	HM, EX	All	---
26. Marine Pollution Control, Inc. 460 Terryville Road Port Jefferson, NY 11776 516-473-9132			3
27. Mid Atlantic Refinery Services 2301 Pennsylvania Avenue Deptford, NJ 08096 609-589-5000	O, HM, T	NY, NJ, PA	3
28. Moran-Crowley Environmental Services 949 East Hazelwood Avenue Rahway, NJ 201-499-9777	O, HM, T&D	All	3
29. New England Marine Contractors 1 Mill Street Burlington, VT 05401 802-658-1441	O, Some HM (No Caustics)	No. NY, MA, VT, NH, ME	3
30. New England Pollution Control, Inc. 7 Edgewater Place East Norwalk, CT 06855 203-853-1990	O, HM, EX, RADSQ	All	3
31. O. H. Materials P.O. Box 1022 Findlay, OH 45840 800-537-9540	O, HM, L, EX, PCB	All	---

Company	Materials Handled	States Covered	USCG Approved
32. Olson & Hassold 62-64 E. 26th Street Paterson, NJ 201-345-4000 Belford, NJ 201-495-1464 " " 1131	O, HM, DISP, T, T&D	NY, NJ, PA	---
33. Peabody-Clean, Inc. 2 Lincoln Street Linden, NJ 07036 201-862-2722	O, HM, L, PCB, PEST, T&D	All	3
34. Pollution Control Unlimited 24 Hichborn St. Brighton, MA 02135 Attn: James Taulor 617-254-0350/0351	O, HM, TR	All	1, 3
35. Paul Pruss & Sons 5428-30 North Front Street Philadelphia, PA 19120 215-455-6175 (PA) 201-862-2307 (Linden) " 437-3675 (Bayonne) " 354-0600 (Elizabeth)	O, Some HM, T (No Solids or Drums)	NY, NJ, CT, DEL	---
36. Pitco-Pricketts Inc. Tank Cleaning Corp. Route 41 Harris Drive Deptford, NJ 08096 609-848-0664	O, T	NJ, So. PA	---
37. Rick Licciardello Sanitation Co. 345 Nottingham Road Woodbury, NJ 08096 609-853-7572	O, TR	NY, NJ	---
38. Rollins Environmental Route 322 Bridgeport, NJ 609-467-3100	O, HM, T&D, Incineration, PCB	All	---
39. Ryckman Associates, Inc. REACT P.O. Box 27310 2208 Welsh Industrial Course St. Louis, MO 63141 314-569-0991	O, HM, PCB, L, PEST, EX, RAD, CON	All	2
40. SCA Services, Inc. (Earthline) 107 Albert Avenue Newark, NJ 07105 201-465-9100	DISP	---	---

Company	Materials Handled	States Covered	USCG Approved
41. Sea-Land Environmental Engineering (Associated with Clean Venture) 990 Naugatuck Avenue Milford, CT 06064 203-877-4267	O, HM, PCB, T, TR	NY, CT, MA, NH, PA, ME, VT	3
42. Sea-Land Restoration, Inc. P.O. Box 2013 Oswego, NY 13126 315-564-5112	O, HM, L, PCB, T&D	NY, CT, VT	3
43. South Jersey Pollution Control, Inc. P.O. Box 28 209 Harmony Road Mickelton, NJ 08056 609-423-1454	O, HMSQ, T&D	NJ, PA, DEL	---
44. Timmes Industrial Maintenance Service 151-29 34th Avenue Flushing, NY 11354 212-886-3982	O, TR, ASB (High Pressure Water Decon.)	NY, NJ, CT	3
45. Triangle, Inc. (Formerly RAD Services) P.O. Box 599 Laurel, MD 20810 301-953-9583	HM, L, PCB, DISPSQ	All	---
46. Underwater Technics, Inc. 2735 Buren Avenue Camden, NJ 08105 609-963-4460	O, LSQ, PESTSQ (Marine Salvagers)	NJ, PA, DEL	3

Key To Abbreviations

ASB - Asbestos

CON - Consultants/Engineers

DISP - Disposal

EX - Explosives

HM - Hazardous Materials

L - Lab Packs

O - Oil Spills

PCB - PCB's

PEST - Pesticides

RAD - Radioactive

SQ - Small Quantities

T - Tank Cleaning

T&D - Handling, Transport, & Disposal

TR - Transport